REMARKS/ARGUMENTS

Pending claims 1-6 and 8-9 stand rejected under 35 U.S.C. § 102(b) over U.S. Patent No. 5,699,426 (Tsukamoto). Applicants respectfully traverse the rejection. As to claim 1, nowhere does Tsukamoto teach that its receiver and display are in separate housings. Accordingly, claim 1 is patentable. Dependent claims 2-3, 5 and 8-9 are rejected over Tsukamoto under the theory of inherency. Office Action, p. 3. However "In relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art." *Ex parte Levy*, 17 U.S.P.Q.2d 1461, 1464 (Bd. Pat. App. & Inter. 1990) (emphasis added). Because Tsukamoto nowhere teaches that its receiver must necessarily be part of a modular platform including replaceable cards (claim 2) or where multiple cards are received in plugs coupled by a bus (claim 3), or that one of the cards is a motherboard including a processor (claim 5), or that plugs for both power and data receive different types of serial bus interfaces (claims 8-9), the rejection of these claims is further overcome.

Pending claims 11, 13-21 and 29-31 stand rejected under 35 U.S.C. §103(a) over Tsukamoto in view of U.S. Patent No. 5,916,736 (Ryan). This rejection is overcome at least because neither reference teaches or suggests encryption or decryption via linear feedback shift registers as recited by amended claim 11. There appears no basis for a rejection of claims 16-21 under these two references, and thus any rejection of these claims over Tsukamoto in view of Ryan is overcome. Claim 29 is patentable as neither of the references teaches or suggests using a linear feedback shift register to change encryption levels.

As to claims 16-19, there is no teaching or suggestion to combine Tsukamoto with Ryan and further with Bennett. In this regard, the Office Action appears to have engaged in the hindsight-based obviousness analysis that has been widely and soundly disfavored by the Federal Circuit. In order to prevent a hindsight-based obviousness analysis, the Federal Circuit requires that "to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the applicant." *In re Kotzab,* 55 U.S.P.Q.2d 1313, 1316-17 (Fed Cir. 2000). No such showing is present here.

With respect to these claims, the Office Action contains no factual support for the motivation, suggestion, or teaching of the manner in which Tsukamoto must be modified in

combination with Ryan and Bennett to render obvious these claims. The simple statement that it would have been obvious to combine these three references does not set forth any legally proper motivation to combine. *See In re Lee*, 61 U.S.P.Q.2d 1430, 1435 (Fed. Cir. 2001). This is especially so, as Bennett is directed to a DSP for cellular communication.

As to dependent claims 32-35, the rejection is overcome as Chang fails to teach or suggest a digital graphics bus including first and second TDMS links. For at least this reason, claims 32-35 are further patentable.

New claim 36 is patentable at least for the same reasons as independent claim 1 from which it depends.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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